

PLEASE TAKE NOTICE that, upon the Declaration of David M. Zensky [Dkt. #111] and the Memorandum of Law [Dkt. #112], both filed in this action on September 2, 2011, in Support of Plaintiffs' Motion to Stay Defendants' Time To Respond to the Amended Complaint in this Action or Commence Motion Practice Until Further Order of the United States Bankruptcy Court for the District of Delaware, or Further Order of this Court (copies of which

Declaration and Memorandum of Law are annexed hereto as Exhibits A and B, respectively), and upon all prior pleadings and proceedings in this action,

Plaintiffs, through their undersigned counsel, will move before the United States District Court for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be set by the Court, for an order:

- (i) granting Plaintiffs' Motion to Stay Certain Defendants' Time To Respond;  
and
- (ii) ordering that the stay does not bar, but instead permits Plaintiffs to:
  - a. further amend the Amended Complaint or move for leave to further amend the Amended Complaint;
  - b. voluntarily dismiss this action or one or more defendants pursuant to Federal Rule of Civil Procedure 41;
  - c. move to add or drop a party or to sever any claim against a party pursuant to Federal Rule of Civil Procedure 21;
  - d. file a motion pursuant to Federal Rule of Civil Procedure 26(d)(1) seeking preconference discovery that may be necessary solely for the purpose of preventing applicable statutes of limitation or other time-related defenses from barring any state law constructive fraudulent conveyance claims against any former Tribune shareholder to recover stock redemption/purchase payments made to such shareholders in connection with the 2007 Tribune LBO;

- e. file a motion for additional time beyond the initial 120 days provided under Federal Rule of Civil Procedure 4(m) to complete service of process; and
- f. file a motion seeking modification of this Order.

This motion seeks the same relief sought in the motion filed in this action on September 2, 2011 for the same reasons set forth in the supporting Declaration and Memorandum of Law filed therewith, but seeks this relief solely with respect to defendants QES QVT Fund LP, QVT Financial LP, and QVT Fund, which defendants were not included within the scope of the September 2, 2011 motion.

Pursuant to Local Civil Rule 6.1(b)(2), any opposing affidavits and answering memoranda shall be served upon the undersigned within fourteen days after service of these moving papers, which are being served upon you by first-class mail on this 14th of September, 2011, and any reply affidavits and reply memoranda shall be served within seven days after service of the answering papers. In computing periods of days, refer to Federal Rule of Civil Procedure 6 and Local Civil Rule 6.4.

\* \* \*

Dated: New York, New York  
September 15, 2011

KASOWITZ, BENSON, TORRES  
& FRIEDMAN LLP

/s/ Paul J. Burgo

David S. Rosner, Esq.

Sheron Korpus, Esq.

Christine A. Montenegro, Esq.

Matthew B. Stein, Esq.

Paul J. Burgo, Esq.

1633 Broadway

New York, New York 10019

Telephone: (212) 506-1700

*Counsel for Plaintiffs, solely with respect to claims  
asserted against Defendants QES QVT Fund LP,  
QVT Financial LP, and QVT Fund.*

TO:

|                  |   |
|------------------|---|
| QES QVT FUND LP  | Craig Newman<br>Richards, Kibbe & Orbe LLP<br>One World Financial Center<br>New York, NY 10281-1003 |
| QVT FINANCIAL LP | Craig Newman<br>Richards, Kibbe & Orbe LLP<br>One World Financial Center<br>New York, NY 10281-1003 |
| QVT FUND         | Craig Newman<br>Richards, Kibbe & Orbe LLP<br>One World Financial Center<br>New York, NY 10281-1003 |